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October 20, 2004

Overnight via UPS (with attachments)

Jo Carole Dawkins  
P.O. Box 845  
63 Pine Street  
Springville, AL 35146  
205-467-6034

Re: STB F.D. No. 34435, Ameren Energy Generating Co. - Construction and Operation  
- in Coffeen and Walshville, Illinois

Dear Jo Carole:

Enclosed please find CWRC's additional supplemental response to the information you have requested in preparation for the Environmental Assessment. This information supplements the answers provided to you on August 9, 2004 and September 10, 2004. The following exhibits are attached to this response:

Revised Exhibit E - Public and Private Road Crossings  
Exhibit Q - Map of Utilities  
Exhibit R - Map of Public and Private Wells  
Exhibit S - Survey of Terrestrial and Aquatic Plan and Animal Communities  
Exhibit T - Hazardous Waste Sites/Materials Map  
Exhibit U - Mine Location Map

Thank you for your attention to these matters, and please let me know if you have any questions based on these materials.

Sincerely yours,



Sandra L. Brown

cc: David Navecky (via hand delivery)  
Glennon Hof

**Note to Reader:** Exhibits Q, R, S, T and U referenced in this letter are available for review by appointment only at the Board's offices, 1925 K Street, NW, Suite 500, Washington, DC 20423. Contact Dave Navecky at 202-565-1593 for an appointment.

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## MEMORANDUM

TO: Jo Carole Dawkins, Dawkins Consulting  
David Navecky, SEA

Cc: Glennon P. Hof

FROM: Sandy Brown  
Rebecca Roback

RE: Supplemental Response to August 6, 2004 and September 10, 2004 Submissions  
STB F.D. No. 34435, Ameren Energy Generating Co. - Construction and  
Operation - in Coffeen and Walshville, Illinois

DATE: October 20, 2004

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This memorandum supplements the responses provided on August 9, 2004 and September 10, 2004 with regard to the questions posed for the rail construction project in STB Finance Docket No. 34435. For each answer, Coffeen and Western Railroad Company ("CWRC") has provided information as known at this time, and will continually update information where necessary. Please assume all answers apply to both Routes A and B unless indicated otherwise.

**Q8. Indicate the number of acres required for Route A and any associated activities such as haul roads, staging areas, etc. How much of that is already owned by Ameren and how much remains to be acquired? From how many landowners? Give the same information for Route B.**

**Updated Response:** CWRC's current calculations show that approximately 163 acres will be needed for the construction of Route A. Approximately 52 acres will be needed for the construction of Route B.

**Q9. Is any of the land required for Route A currently in public ownership? If so, indicate the owner and number of acres involved? Give the same information for Route B.**

**Updated Response:** CWRC recently learned that there is some land near Route A that is publicly owned. At Route 127, along Route A, there is approximately 0.5 acres of land within the right of way which is owned by The People of the State of Illinois, Department of Transportation.

**Q12. Give the name of all roads and rail lines to be crossed by Route A. Give the station number on Route A where each crossing would occur. Indicate the proposed crossing method and protection. If a grade separation is proposed, describe and provide a diagram of the crossing structure. For roads, indicate if public or private. Show the public road crossings by name on a map. For public roads to be crossed at grade, give average daily traffic (ADT) figures if such figures are available. Give the same information for Route B.**

**Updated Response:** Please find attached a revised Exhibit E, correcting the station number for CR 425, Elm Trail for Route A. The correct station number for Elm Trail is ECS 529+90 rather than 509+82 previously listed. The name for CR 900 has also been revised, and will now be referred to as Fox Hunt Trail due to some local confusion about whether the county road designation at this point is 900 or 925. In addition, CWRC is proposing to add flashers/gates for the crossing at CR 9/Panama Ave as part of its voluntary mitigation to accommodate a community request raised by the Bond County Engineer. The private crossing previously listed for Volentine is not a road crossing and should not have been included in Exhibit E. This is an example where CWRC is working with landowners to minimize the impact to severed lands that may occur from the construction.

**Q14. Indicate utilities (such as pipelines or power lines) to be crossed by Route A or associated facilities, the type of utility to be crossed, station number of crossing, and what sort of modification (if any) would be needed due to the proposed crossing. Would other utilities near to but not actually crossed by Route A need to be modified as a result of the proposed construction? Give the same information for Route B.**

**Response:** Please see attached Exhibit Q, a map of utilities with a key listing the type of utility and the station number of that utility. CWRC is working with each utility to determine the appropriate modification needed, if any, and entering into an agreement regarding the same, if necessary. CWRC does not anticipate that any utilities near to but not actually crossed by Route A or B will need to be modified as a result of the proposed construction.

**Q14a. Identify all public and private water supply wells within the Route A ROW and describe any modification (if any) needed due to the proposed rail construction. Give the same information for Route B.**

**Response:** Please see attached map, Exhibit R, with all public and private water supply wells in the vicinity of Route A and Route B. For the wells located within the ROW that will be on property that CWRC will own, CWRC will cap or otherwise close those wells in accordance with Illinois regulations.

**Q15. List all drainageway crossings to be made within the Route A ROW either by the new rail line itself or by roads to be constructed within the ROW. List the drainageway to be crossed by name, if known, and station # of the crossing. Are the drainageways perennial or intermittent? Indicate how the crossings would be made. If a bridge or culvert is to be used, briefly describe the structure and the steps involved in constructing it.**

**Provide a diagram of the proposed crossing structure. Indicate if the crossing structures would be designed to pass 100-year flood events. Give the same information for Route B.**  
**Updated Response:** CWRC will provide additional information to this question shortly.

**Q16. Specify locations and acres of ROW and construction activity that would occur within the 100-year floodplain.**

**Response:** The locations of the floodplains are shown in the wetland delineation provided on September 10, 2004. CWRC will provide acreage numbers shortly.

**Q17. List all wetland sites to be affected by construction of Route A itself, by construction of any roads within the rail ROW, and by ancillary activities such as borrow/spoil sites, access roads, staging areas, etc. Indicate the wetland acreage to be affected at each site and whether the effect is the result of filling or excavation. Also, at each wetland site, break down the total affected wetland acreage by wetland type (e.g., forested, palustrine emergent, scrub-shrub, open water, etc.) and indicate the wetland values and functions of the affected acreage. If detailed plan views of the affected wetlands are prepared in conjunction with US Army Corps of Engineers or other agency permitting, provide a copy of those plans. Also, show the approximate location of affected wetland areas on a 1": 2000' topo. Describe any proposed wetland mitigation. Give the same information for Route B.**

**Updated Response:** CWRC will provide a copy of the joint application recently filed with the U.S. Army Corp of Engineers, IEPA, and IDNR.

**Q23. To your knowledge, along either route would you be cutting into any aquifers or placing fill over any exposed recharge areas?**

**Response:** The security clearance necessary to review private recharge information has not been completed. However, consultation with the Bureau of Water at the IEPA has confirmed that no aquifers or recharge areas are in or adjacent to the project area.

**Q27. Provide a survey of terrestrial and aquatic plant and animal communities present or expected to be present along and within both Routes A and B. Include in this survey an assessment of expected impacts of proposed rail construction activities on those communities, including conversion of habitat to rail use. In the survey an assessment of expected impacts of proposed rail operations on critical animal behavior. Also include an assessment of ROW maintenance procedure impacts on plant and animal communities.**

**Response:** Please see Exhibit S, attached survey of terrestrial and aquatic plant and animal communities along and within Routes A and B.

**Q31. Are you aware of any hazardous waste sites or sites where there have been releases of hazardous materials within Routes A or B? If so, identify the location of the site(s), the types of hazardous materials involved, and the nature and extent of any plans for removal of the material. Please see the Illinois DOT letter to Dawkins Environmental Consulting dated April 1, 2004, specifically the attachment from the Illinois State Geological Survey listing certain hazardous waste/material sites in the area. Please locate the Route A and Route B sites on a map.**

**Response:** Please find attached Exhibit T, a map depicting the potential hazardous waste/material sites in the proposed construction area, and the distance of each of the sites to the grading limits of both Routes A and B. There are no hazardous waste sites within the proposed grading limits of the project. Furthermore, any pipelines that are crossed by Route A or Route B will be modified as appropriate.

CWRC researched for additional information on the location and status of the sites listed in the attachment from Illinois State Geological Survey ("ISGS"). CWRC's review included electronic and paper searches of IEPA files, consultation with utilities, and physical inspection, as necessary. Additional available information is provided below. CWRC found no additional sites other than those listed in the ISGS letter.

#### Abbreviations Used

BOL	Bureau of Land (IEPA Division)
CAA	Clean Air Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generator (hazardous waste program)
ECHO	Enforcement and Compliance History Online
ESH	Ameren Services Environmental, Safety & Health Department
IEMA	Illinois Emergency Management Agency
IEPA	Illinois Environmental Protection Agency
LIT	Leaking Underground Storage Tank Incident Tracking
LPC	Land Pollution Control
LUST	Leaking Underground Storage Tank
OSFM	Office of the State Fire Marshall
RCRA	Resource Conservation and Recovery Act (hazardous waste program)
SRP	Site Remediation Plan
USEPA	United States Environmental Protection Agency
UIC	Underground Injection Control
UST	Underground Storage Tank

1. **EPA regulated facilities site: Country Grain Elevators, Inc. Route 127, Donnellson (ID #110007056247).** Although there is a reported release of hazardous air pollutants from this site, the site status is listed as Permanently Closed. This site is located 1,240 feet from Route A and 20,694 feet from Route B.
2. **Landfill/Special Waste Site: Carroll Wright (R.R. 1) (IEPA # 1358050001).** Based on available information and on GIS mapping, this site appears near the intersection of Proposed Route A and IL 127 and is identified as a landfill and special waste site. CWRC did not find any results for the site on the IEPA database website. CWRC performed an on-site inspection of the area on September 15, 2004. The only "waste" located at this site was a small old junk pile that includes some old scrap metal and other miscellaneous trash. This site is located 1,432 feet from Route A and 23,339 feet from Route B.

3. **Pipeline site - Illinois Power ("IP") 8" natural gas pipeline, southeast quarter of Section 13, T7N, R4W.**  
CWRC is currently working with IP to determine the appropriate accommodations for this pipeline. This site is located on Route A and 25,795 feet from Route B.
4. **Hazardous Waste Handler: Propellex Corp. (Hwy 127 S, Donnellson). (ID #110007544069) (Latitude = 39.035537 & Longitude = -89.476192).** RCRA Federal Facility ID: ILD984838086 RCRA Facility Status: CESQG. Date of last RCRA Inspection: 8/10/1995. This site has been identified as generator of hazardous waste less than 100 kilograms of non-acute waste per month. This site is located 5,779 feet from Route A and 24,925 feet from Route B.
5. **Landfill/BOL/IEMA Incident/TRI site: CIPS landfill ( 134 CIPS Lane).** This site appears on the most recent IEPA BOL database (BOL# 1358030005). IEMA incident database (IEMA database nos. 840360, 20031489, 20021474). This site is a Coffeen-permitted landfill, which is currently located on plant property, but not located along the proposed alignment. This site is located 6,294 feet from Route A and 49,249 feet from Route B.
6. **Landfill/BOL/IEMA Incident/TRI Surface Impoundment/Underground Injection control site: Ameren Central Illinois Public Service Co. (CIPS) Power Station, (R.R. 1, P.O. Box 306).** This site appears in the most recent IEPA LUST database under the name CIPS Coffeen Power Station (incident #901393); BOL database (BOL # 0431205094), IEMA incident database (IEMA # 19940800) under the name CIPS facility RR#1, TRI database (USEPA ID # ILD000667212) and the National Response Center database (report #235040). A county collection article documents that these ponds were used to mix fly ash with water from abandoned underground mines in the vicinity of the plant and then inject the resulting slurry back into the same area of the mine. This site is the Coffeen permitted UIC site, which is currently located on plant property, but is not located along the proposed alignment. This site is located 6,294 feet from Route A and 49,429 feet from Route B.
7. **Pipeline site.** This pipeline was located on GIS maps as crossing the proposed project in the northwest quarter of Section 32, T7N, R4W. CWRC is currently working with IP, the owner of the pipeline, to make adequate accommodations on this and any other pipeline crossed by Route A or Route B. This site is located 15,451 feet from Route A and on Route B.
8. **Former UST site: Hillsboro Mine/Coffeen Power Plant (RR 1, Donnellson).** This site appears on the OSFM UST list (OSFM # 5004966). The OSFM State UST Database Facility ID: 132108525 indicates the status of this facility is closed. This site is located 6,981 feet from Route A and 49,156 feet from Route B.
9. **Spill site.** This site is listed on the IEMA database as "Oil spill into Coffeen Lake" (IEMA # 770177). This was a one-time incident, and there were no additional results listed on the IEPA database website. This site is located 4,171 feet from Route A and 46,965 feet from Route B.

10. **Possible UST site: Laurence Group, Inc. (NWc Rt. 127 & Co Rd. 18).** This site appears on the OSFM list in Donnellson, IL (OSFM #6030515). The OSFM State UST Database Facility ID: 80832431 shows Site Status: Exempt. This site is located 25,096 feet from Route A and 25,924 feet from Route B.
11. **LUST site: Carter & Grimsley Attorney at Law (Route 127, Donnellson).** This LUST site is listed as having releases of gasoline and diesel fuel on the IEPA LUST list (IEMA #979567: LPC # 1354365001). There was limited data provided on the IEPA LIT database, but indicated a Notice of Release letter was sent on 4/8/1997 and a Review Letter was sent on 6/11/1997. This site is located 7,674 feet from Route A and 25,070 feet from Route B.
12. **BOL site: US Minerals LLC (796 CIPS Trl.)** This site appears on the BOL database (IEPA # 1350155005). There was no data available on the IEPA website database, but a USEPA ECHO Report was generated on 9/2/04, which indicated all permits are complied with. This site is located 2,937 feet from Route A and 50,580 feet from Route B.
13. **Former UST site: Fillmore Grain Co. (Box 158 Rt. 127).** This site appears on the OSFM UST list in Donnellson (OSFM #5004966). The OSFM State UST Database Facility ID: 132108525 indicates Site Status as Closed. This site is located 6,981 feet from Route A and 49,156 feet from Route B.
14. **Archived CERCLIS site: Illegal Dump Shoal Creek (Northeast 530 T7N Rte 4 West: near Sorento).** This site occurs on the Archived CERCLIS sites list under the name Illegal Dump Shoal Creek (USEPA # ILD981952526). CWRC believes that the location listed in the ISGS letter and shown in CERCLIS records may be incorrect and has developed two potential interpretations. The first is that this location is the Northeast quarter of Section 30 located in Tier 7 North, Range 4 West, located near Sorento, IL to the North. This quarter has a tributary of Shoal Creek running through it, which is Lake Fork Creek. Alternatively, the location is the Northeast quarter of Section 33 located in Tier 7 North, Range 4 West located near Sorento to the East. This quarter has Shoal Creek running through it. This site is located 6,751 feet from Route A and 1,805 feet from Route B.
15. **SRP site: Norfolk & Western Railway Co. (1900N 1.5 miles east of CR 9), Sorento, IL.** SRP database website shows inactive site with a date enrolled as 1/5/1999. This site is located 14,197 feet from Route A and 6,474 feet from Route B.

In addition, please find attached Exhibit U, a map depicting all underground mines located near the proposed routes. Route A will barely cross the upper left boundary of an underground shaft mine, labeled ISGS index 76, which operated between the years 1906 and 1934. Route B will cross over an underground shaft mine labeled ISGS index 2005, which operated between the years 1884 and 1911. Herrin is the coal seam mined for both mines. CWRC does not anticipate any problems in crossing near to or over these underground mines. These mines are deep mines and will not be impacted by, or cause impact to, the proposed construction and operation of either route.

**Q36. Give the number of expected annual coal train trips over the proposed rail line, both loaded and empty, at startup and in the foreseeable future.**

**Q42. Indicate, if known, the days of the week and approximate time of day of train operations, both loaded and empty, over the proposed line.**

**Updated Response:** In response to both Q36 and Q42, CWRC provides the following. The Coffeen Power Plant burns coal 24 hours a day, 365 days a year. The Plant currently receives approximately 3.0 million tons of coal per year. CWRC expects to use train configurations of 115 cars and move approximately 257 loaded trains per year or an average of 0.704 loaded trains per day (or less than two trains a day on average of loaded and empty trains). This configuration and number of trains would enable CWRC to move approximately 3.4 million tons of coal to the Coffeen Power Plant per year. For the foreseeable future, CWRC does not anticipate exceeding 300 loaded trains per year or an average of 0.8219 loaded trains per day (or less than two trains a day on average of loaded and empty trains). No request to date has been made to CWRC to move other traffic or commodities over the line. Trains may operate at various times during the day.

**Q45. Describe any impact mitigation which you are currently proposing, to the extent it has not already been dealt with in the above items.**

**Response:**

CWRC is undertaking voluntary mitigation at CR 9, Panama Avenue, where CWRC has proposed an upgrade from crossbucks to flashers and gates in order to increase safety at this crossing.

CWRC agrees to employ and have any contractor retained to employ best management practices during the construction process, including maintaining construction and maintenance vehicles in good working order.

CWRC will comply with mitigation requirements contained in any additional permits issued by the Army Corp of Engineers.

CWRC will comply with Illinois State Historic Preservation Office requirements with regard to cultural resources issues.

At its sole cost, CWRC will install the necessary signage, lighting, and safety warnings for all at-grade crossings.

CWRC commits to working with farmers and ranchers to remedy actual damage to crops, pastures, or rangelands caused by construction.

CWRC will ensure all construction debris is removed and disposed of in a proper and legal manner consistent with state and local disposal procedures.

CWRC will follow federal, state, and local regulations regarding the control of fugitive dust emissions. This may include spraying water, applying a magnesium chloride treatment, placing tarp covers on vehicles and installing wind barriers as needed.



CWRC will select a contractor who will perform all maintenance and inspections in compliance with Federal Railroad Administration ("FRA") standards. CWRC will take all necessary steps to ensure that appropriate vegetation control is followed and herbicides applied are approved by the U.S. Environmental Protection Agency. In addition, CWRC will ensure that the herbicide spraying company is licensed.

CWRC shall comply or require any operators to comply with FRA regulations for train operations and locomotive noise standards.

CWRC will supplement this response as appropriate.

**COFFEEN & WESTERN RAILWAY  
PROPOSED ROAD-RAIL CROSSINGS**

**ROUTE A**

Road	Type	Station Number	Crossing Method	Safety Device	ADT
Brackett	Private	ECS 67+00	At Grade	Crossbucks	N/A
CR 400 - N. 4 <sup>th</sup> Ave.	Public	ECS 115+37	At Grade	Crossbucks	150
CR 1375 - Arrow Trail	Public	ECS 130+74	At Grade	Crossbucks	25
CR 1275 - Buckeye Trail	Public	ECS 187+36	At Grade	Crossbucks	75
Ill Rte 127, CR 1125	Public	ECS 257+47	At Grade	Flashers/Gates	2500
CR 1025 -Pheasant Trail	Public	ECS 334+96	At Grade	Crossbucks	N/A
Fox Hunt Trail	Public	ECS 366+88	At Grade	Crossbucks	<175*
Laughlin Lane	Private	ECS 401+65	Grade Separated <sup>1</sup>	N/A	N/A
CR 650/10 – Long Bridge Trail	Public	ECS 525+32 BN**	At Grade	Crossbucks	<500*
CR 350 – Loew Ave	Public	ECS 529+75 BN**	At Grade	Crossbucks	450
CR 625 Old Brushy Road	Public	ECS 541+46 BN**	At Grade	Crossbucks	325
CR 300 - N. 3 <sup>rd</sup> Ave.	Public	ECS 575+25 BN**	Grade Separated <sup>2</sup>	N/A	100
Weiss	Private	ECS 581+25 BN**	At Grade	Crossbucks	N/A
CR 425 - Elm Trail	Public	ECS 529+90 UP**	At Grade	Crossbucks	<500*

**ROUTE B**

Road	Type	Station Number	Crossing Method	Safety Device	ADT
CR 9 - Panama Ave.	Public	ECS 33+15	At Grade	Flashers/Gates	550
CR 625 - Old Brushy Road	Public	ECS 61+09	At Grade	Crossbucks	275
CR 575 - Singer Trail Road	Public	ECS 117+00	At Grade <sup>3</sup>	Crossbucks	<75*
CR 300 - N. 3 <sup>rd</sup> Ave.	Public	ECS 199+46	At Grade	Crossbucks	100
Existing NS line (13)	10 Public 3 Private	3 Private	At Grade	Various	

\* ADT volumes are not published for these roads. Instead, the number shown reflects the highest ADT volume of surrounding roads.

\*\* The “BN” or “UP” designation next to certain station numbers indicates whether the location is for the BN or UP connection portion of Route A as applicable.

<sup>1</sup> This crossing is proposed as a grade separated crossing in order to accommodate the area topography.

<sup>2</sup> This crossing is grade separated to accommodate the crossing of Lake Fork Creek.

<sup>3</sup> There will be a realignment of the road made for this crossing.